

From: "Coffey, Scott" <CoffeySE@cdmsmith.com>
To: "Sheldrake, Sean" <sheldrake.sean@epa.gov>
"Zhen, Davis" <Zhen.Davis@epa.gov>
CC: younghs@cdmsmith.com
"Ebright, Stephanie" <EBRIGHT.STEPHANIE@EPA.GOV>
Date: 5/6/2018 9:24:57 PM
Subject: RE: Additional fish tracking activity. Deliberative
Attachments: [Sediment Sampling and Fish Tracking Issues Timeline_with Implications Summary.docx](#)

I've updated the timeline list highlighting Pre-RD Group actions that have knowingly (with oversight staff warning) deviated from the FSP without EPA notification, review and approval. Updated timeline is attached, but I summarize below:

There have been 5 FSP deviation events in all and 2 of these occurred after our face-to-face on Thursday.

Event 1 - The three surface sediment FSP deviations that prompted EPA's deficiency letter on Tuesday May 1st
Event 2 - Sonar survey addition during upper reach surface sediment reconnaissance. Issue pointed out by Davis Zhen during Thursday May 3rd Porewater meeting.
Event 3 - Fish scale deviation. Identified by EPA oversight staff on Thursday May 3rd. EPA received FSP modification request on Friday (after the deviation occurred). Modification was approved.
Event 4 - Post Fish surgery holding time deviation. Noted Friday
Event 5 - Added Fish tracking survey deviation. Noted Friday evening/performed without approval Saturday.

It is becoming clear that Pre-RD Group upper management is not clearly communicating to field staff and technical mid-level subject matter experts that they need to follow (exactly) the approved FSP and if they want to perform a new activity, or deviate, they need to notify and provide EPA an FSP modification/change form. The Pre-RD Group subject matter experts (Betsy and Anne) seem to be the worst offenders as they think the deviation, or added information makes technical sense and they decide it needs to be done immediately with no time to get EPA review and input.

Scott

From: Sheldrake, Sean <sheldrake.sean@epa.gov>
Sent: Saturday, May 05, 2018 11:07 AM
To: Zhen, Davis <Zhen.Davis@epa.gov>
Cc: Young, Howard S. <younghs@cdmsmith.com>; Coffey, Scott <CoffeySE@cdmsmith.com>; Ebright, Stephanie <EBRIGHT.STEPHANIE@EPA.GOV>
Subject: Re: Additional fish tracking activity. Deliberative

Yes, tricky- at least we were notified such that we can provide oversight but Scott please add it to the list-extracurricular fsp activity without epa approval of protocol.

Thanks

S

Sean Sheldrake, RPM
Unit Diving Officer
206.225.6528
Sent from my iPhone

On May 4, 2018, at 9:14 PM, Zhen, Davis <Zhen.Davis@epa.gov> wrote:

Sean and Scott,

I spoke to Howard and proceed with the observation. Howard and I believe the information will be useful for later. This is a tricky situation where the activity is not a sampling event nor is it related to an FSP.

Let talk on Monday about this.

Thanks,

Sent from my iPhone, please excuse typos

Davis Zhen, Manager
Site Cleanup Unit 2
Office of Environmental Cleanup
[1200 Sixth Avenue Suite 155](#)
M/S ECL – 122, [Seattle, WA 98101](#)
Tel: [\(206\) 553-7660](#)
Cell: [\(206\) 437-5826](#)

On May 4, 2018, at 6:21 PM, Young, Howard S. <younghs@cdmsmith.com> wrote:

Hi Sean and Davis,

We just heard the PrevRD group will do an additional check on the tagged fish tomorrow. This is not an activity covered by there FSP and we have notified them of that. Can you let me know if you would like to have Jason Silvertooth observe this additional activity? Have him tentatively lined up.

Thanks
Howard